

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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WI-LAN INC.,

Plaintiff,

v.

**LG ELECTRONICS, INC. and LG  
ELECTRONICS U.S.A., INC.,**

Defendants.  
-----X

10 Civ. 432 (LAK) (AJP)

**NOTICE OF MOTION TO AMEND  
PLEADINGS**

PLEASE TAKE NOTICE that, upon the annexed Affirmation of James J. Lukas, Jr., together with supporting exhibits annexed thereto, the accompanying Memorandum of Law, and upon all pleadings and proceedings previously had herein, the undersigned, counsel for Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc., will move this Court, located in Room 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order:

1. Allowing Defendants to file their First Amended Answer and Counterclaims to Plaintiff's Second Amended Complaint pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.
2. Granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to S.D.N.Y. Civ. R. 6.1 and the Court's Individual Practices, answering papers and affidavits, if any, are required to be served upon the undersigned no more than fourteen (14) days from the date this Motion was served.

PLEASE TAKE FURTHER NOTICE that Defendants discussed this Motion with counsel for Plaintiff, who would not agree to stipulate this Motion.

Dated: December 6, 2010

**GREENBERG TRAURIG, LLP**

*/s/ James J. Lukas, Jr.*

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